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September 19, 2025

Via ECF & Email

Honorable Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v Cooper, et al 25 CR 10 (DG)

Dear Judge Gujarati:

I write on behalf of the parties to respectfully request that the status conference currently scheduled for September 29, 2025 be adjourned until the week of December 8, 2025.¹

This request is made because the Government is currently in the process of producing another 2TB of discovery which had not previously been produced. The additional discovery includes over 3 million pages of SEC documents and approximately 20,000 pages of Title III “line sheets”. Clearly, the defense is going to need time to review the additional material before a motion schedule and a trial date can be set.

If the adjournment is granted, the parties also ask the Court to exclude time under the Speedy Trial Act between September 29, 2025 and the new status conference date to permit the defense to review the discovery and explore if there is a chance to resolve the matter, without the need of a trial.

¹ The parties have conferred, and we are all available on: December 8, 9, 10 (afternoon) or 11, 2025.

I thank you in advance for your consideration of this request.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Scott Leemon', enclosed within a thin black rectangular border.

Scott Leemon

cc: All counsel (via ECF)